

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

In re: Debtor(s) name(s) used by the debtor(s) in the last 8 years, including married, maiden, and trade):

Jeffrey M. Garber
Debtor 1

Nationstar Mortgage, LLC
Movant(s)

v.

Jeffrey M. Garber

Respondent(s)

Jack N. Zaharopoulos, Esquire
Standing Chapter 13 Trustee

Additional Respondent

Chapter 13

Case No. 1:23-BK-00249-HWV

Matter: Motion for Relief from the Automatic Stay

Document No. 40

**DEBTOR(S)' ANSWER TO MOVANT(S)' MOTION
FOR RELIEF FROM THE AUTOMATIC STAY**

AND NOW, come the Debtor(s), Jeffrey M. Garber, through their attorney, Paul D. Murphy-Ahles, Esquire and DETHLEFS PYKOSH & MURPHY, who files the within Debtor(s)' Answer to Movant(s)' Motion for Relief from the Automatic Stay and aver as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.

6. Admitted. By way of further response, as indicated in the Original Plan, Debtor(s) intent to list the property on the open market for sale as there is equity in the property to pay Movant(s) in full and provide for distribution to allowed and timely filed proof of claims. Further, relief from the stay and foreclosure of the property will be detrimental to creditors in this case as the proceeds from the sale can be distributed.

7. Admitted. By way of further response, as indicated in the Original Plan, Debtor(s) intent to list the property on the open market for sale as there is equity in the property to pay Movant(s) in full and provide for distribution to allowed and timely filed proof of claims. Further, relief from the stay and foreclosure of the property will be detrimental to creditors in this case as the proceeds from the sale can be distributed.

8. Upon information and belief, the averment as stated in Paragraph 8 is admitted.

9. Paragraph 9 contains a conclusion of law to which no response is required.

10. Denied. Debtor(s) are without sufficient knowledge as to the truth of the averments as stated in paragraph 10; therefore, they are denied.

11. Paragraph 11 contains a conclusion of law to which no response is required.

WHEREFORE, Debtor(s) requests this Court deny the requested relief.

Respectfully submitted,
DETHLEFS PYKOSH & MURPHY

Date: May 22, 2023

/s/ Paul D. Murphy-Ahles

Paul D. Murphy-Ahles, Esquire
PA ID No. 201207
2132 Market Street
Camp Hill, PA 17011
(717) 975-9446
pmurphy@dplglaw.com
Attorney for Debtor(s)

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CERTIFICATE OF SERVICE

I hereby certify that on Monday, May 22, 2023, I served a true and correct copy of the **Debtor(s)' Answer to Movant(s)' Motion for Relief from the Automatic Stay** in this proceeding via electronic means upon the following:

Brian Nicholas, Esquire
KML Law Group, PC
701 Market Street, Suite 5000
Philadelphia, PA 19106-1532
Counsel for Movant(s)

Jack H. Zaharopoulos, Esquire
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036

Office of the United States Trustee
Sylvia H. Rambo US Courthouse
1501 North Sixth Street, 3rd Floor
Harrisburg, PA 17102

/s/ Kathryn S. Greene

Kathryn S. Greene, RP®, Pa.C.P.
Paralegal for Paul D. Murphy-Ahles, Esquire